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EX PARTE OR LATE FILED

April 27, 1995

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

RECEIVED

APR 27 1995

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

RE: PP Docket No. 93-253

Dear Mr. Caton:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, GO Communications Corporation hereby notifies the Commission that on April 27, 1995, Lawrence R. Sidman of Verner, Liipfert, Bernhard, McPherson and Hand, along with John Malloy, General Counsel of GO Communications Corporation, met with Jill Luckett, Legal Advisor to Commissioner Rachelle B. Chong; and Mary P. McManus, Legal Advisor to Commissioner Susan Ness, to discuss the attached handout, regarding timing and procedures for conduct of the C Block PCS auctions.

An original and one copy of this letter have been submitted to the Secretary. Please direct any inquiries concerning this matter to the undersigned.

Respectfully submitted,

VERNER, LIIPFERT, BERNHARD
MCPHERSON AND HAND

By: Lawrence R. Sidman
Lawrence R. Sidman

cc: Jill Luckett, Esq.
Mary P. McManus, Esq.

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List A B C D E

PCS Entrepreneurs Speed to Market is Crucial

GO Communication Corporation

April 27, 1995



Speed is Crucial In A Competitive Market

Jack Welch, Chairman of General Electric, in *"Get Better or Get Beaten"* (1994):
"Speed is everything. It is the indispensable ingredient in competitiveness."

Ries and Trout, in *"The 22 Immutable Laws of Marketing"* (1994): "1. The Law of Leadership. It's better to be first than to be better. 2. The Law of Category. If you can't be first in a category, set up a new category you can be first in. The leading brand in any category is almost always the first brand into the prospect's mind."

William Bygrave, in *"The Portable MBA in Entrepreneurship."* (1994): "Time plays a crucial role in many potential opportunities. In some emerging industries, there is a definite window of opportunity that opens only once."

Treacy and Wiersema, in *"The Discipline of Markets Leaders"*(1995): "Delays set customers' teeth grinding...Their directive to the marketplace: Continuously shrink the interval between our need and when you fill it."



Impact Even Greater in Wireless Market

- United Kingdom-1st and 2nd PCN competitors are thriving while 3rd license was returned as non-viable
- Korea-2nd wireless licensee (Joint venture: Airtouch Communications, Southwestern Bell and Pohang Iron & Steel Co.) are claiming damage due to CDMA delays
"The value of the license deteriorates as KMT (incumbent cellular provider) broadens its considerable base."
(3/10/95 WSJ)
- U.S.- Even fastest PCS competitor is at best third wireless licensee while last competitor will have no ability to differentiate versus entrenched cellular and PCS competitors



Delay is Killing PCS Entrepreneurs as Full Fledged Competitors

Investor Objections Are Becoming Insurmountable

- November 1994-"How are you going to build and operate a PCS network?"
- March 14, 1995-"How are you going to compete against Primeco(57/165 million pops), Wireless Co.(184/205 million pops) and AT&T (107/173 million pops)?"
- March 16, 1995-"How can you compete against these giants as the 6th licensee and is there even enough value in that license if you're 6 to 12 months behind in the market?"



A/B Winners Are Racing Ahead and Drying Up Capital Markets

- Wireless Co. is now attracting former C block strategic investors to join as Affiliate Members and has already added APC and Cox as Affiliates
- AT&T has announced TDMA technology and is conducting PCS like trials in 3 different regions of the country
- Primeco has already hired over 200 employees and begun spectrum clearing and site acquisition
- Wall Street has already written off PCS entrepreneurs due to delay and regulatory uncertainty..."We assume the third PCS provider has a tough time" (Merrill Lynch Report, 2/10/95)



Process Has Already Given A/B Winners a Sizable Headstart

A/B Timeline

- 9/19/94 FCC Announces Short Form and Auction Dates
- 10/28 Short Forms Accepted
- 12/5 A/B Auction Begins
- 3/13/95 A/B Auction Ends
- 4/14 FCC Announces Long Form Acceptance
- 5/15 FCC Begins Issuing A/B Licenses
- 5/20 All Unchallenged A/B Licensees Begin Construction

C Block Timeline

- 12/23/94 FCC Announces Short Form Date
- 2/10/95 FCC Delays Short Form and Auction Dates
- 3/15 Court of Appeals Stays C Block Short Forms and Auction
- 4/28 FCC Announces C Block Short Forms in 45 Days and Auction in 75 days
- 7/12 C Block Auction Begins
- 12/12 C Block Auction Ends

Current FCC Course Yields at Least a 9 Month Headstart



FCC Has the Ability to Keep the Race Fair For Full Competition

- FCC Must Hasten Both the Start and End of the C Block Auction
- Announce Commencement of C Block Process by 4/28
- Begin C Block Auction by 7/12
- Commit to Speed the C Block Auction to Close in One Month or 80 Rounds



Auction Rules Already Provide Ready Made Solutions to Help Entrepreneurs and Aid Auction Administration

- Begin Auction in Stage 2
- Move to Stage 3 After Activity Drops Below 40% Eligible Pops
- Independent BTA Closings in Stage 3 After Minimum Inactivity of 5 rounds
- Escalate Rounds Per Day
 - Days 1-3: 2 rounds per day
 - Days 4-6: 3 rounds per day
 - Days 7+: 4 rounds per day
- Maintain Large Bidding Increments
 - Markets 1-50: 50 cents/Pop
 - Markets 51-100: 40 cents/Pop
 - Markets 101+: 25 cents/Pop

